

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

ERIC L. JEFFRIES,

Plaintiff,

VS.

CENTRE LIFE INSURANCE COMPANY,  
et al.,

Defendants.

Case No. C-1-02-351

(Judge Beckwith)  
(Magistrate Judge Hogan)

**NOTICE OF FILING AFFIDAVIT**  
**OF ANDREW COHEN**

Now comes Defendant Centre Life Insurance Company and gives notice of filing the Affidavit of Andrew Cohen with regard to bad faith claims filed against Centre Life Insurance Company and/or DMS. During the period from 1999 to the present there have been nine lawsuits initiated by CLIC policyholders from states comprising the Sixth Federal District Court of Appeals. In those nine cases, there were no judgments for bad faith and there were no settlements in excess of, at or even close to the present value of the policies at issue.

Respectfully submitted,

s/Peter M. Burrell

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and Disability Management Services, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been filed with the Court by electronic means on this 6<sup>th</sup> day of October 2003 and by regular U.S. Mail. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system and by regular U.S. Mail. Parties may access this filing through the Court's system.

s/Peter M. Burrell  
Peter M. Burrell, Esq.

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